

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:19-CV-767-ECM
)	
HYUNDAI MOTOR)	
MANUFACTURING, ALABAMA,)	
LLC; HYUNDAI ENG AMERICA,)	
INC.; and DYNAMIC SECURITY,)	
INC.)	
)	
Defendants.)	

EXHIBIT "A" TO

PLAINTIFF'S OBJECTIONS TO DYNAMIC SECURITY INC.'S

DEPOSITION DESIGNATIONS

KRISTAL RIDDLE

Case	Key, Davita
Issue Code	Dynamic Designation

RIDDLE, KRISTAL 8/19/22 VOL 1		
1	008:08 - 008:21	008:08 09 10 11 12 13 14 15 16 17 18 19 20 21
2	018:18 - 018:21	018:18 Q. Are those meetings held generally at 19 the same time twice a year, or do they kind of 20 move around? 21 A. Roughly the same time every year.
3	052:02 - 052:10	052:02 Q. When was the policy and procedure 03 manual created? 04 A. The policy and procedure manual was 05 originally created in 1998 and is updated as 06 needed or -- and reviewed once a year and then 07 updated as needed. 08 Q. Okay. So the policy and procedures 09 manual would have been in effect in 2017? 10 A. That's correct.
4	054:01 - 054:04	054:01 MR. REDMOND: I'm going to object to 02 the form if you're asking her for a legal 03 conclusion. 04 MS. PALMER: Just for opinion.
5	056:02 - 056:02	056:02 MR. REDMOND: Object to form.
6	059:06 - 059:17	059:06 Q. Okay. And I just want to clarify 07 because we may be talking about two different 08 things. You said that you reviewed Latunya

		<p>09 Howell's statement, Ray Cureton -- did you say</p> <p>10 Ray Cureton?</p> <p>11 A. I didn't rely on his statement as</p> <p>12 much as -- as regards to what actually happened</p> <p>13 in -- on that day between -- between Keys,</p> <p>14 Robinson, and Williams, but I did take it into</p> <p>15 account.</p> <p>16 Q. Okay.</p> <p>17 A. My primary focus were those three.</p>
7	061:09 - 061:11	<p>061:09 Q. Are you aware that Ms. Williams</p> <p>10 requested Ms. Key's removal?</p> <p>11 A. I am aware.</p>
8	061:20 - 062:02	<p>061:20 Q. Who was Ms. Williams -- where was</p> <p>21 Ms. Williams requesting Ms. Key be removed</p> <p>22 from?</p> <p>23 MR. MILLER: Object to the form.</p> <p>062:01 MS. BROWN: Object to form.</p> <p>02 A. From Hyundai property.</p>
9	064:10 - 065:04	<p>064:10 Q. How did you become aware that she was</p> <p>11 offered any positions?</p> <p>12 A. By a -- by conversations with Ray</p> <p>13 Cureton. I believe Nicole Scavella also</p> <p>14 affirmed that positions were offered to her.</p> <p>15 And we have the notations that these positions</p> <p>16 were offered to her.</p> <p>17 Q. Did you check with Ms. Key to see</p> <p>18 what her position would be?</p> <p>19 A. No. Ms. Key was uncommunicative.</p> <p>20 Q. How -- tell me what you mean by she</p> <p>21 was uncommunicative.</p> <p>22 A. She was refusing contact from the</p> <p>23 branch office.</p> <p>065:01 Q. Okay. Who at the branch office tried</p> <p>02 to contact her?</p> <p>03 A. My understanding is that it was Ray</p> <p>04 Cureton.</p>
10	067:14 - 067:16	<p>067:14 Q. And who would have made the</p> <p>15 determination as to whether to hire?</p> <p>16 A. Gloria Robinson and Ray Cureton.</p>
11	090:05 - 091:12	<p>090:05 Q. All right. And if you'll look for me</p> <p>06 on the third -- wait. No, that's okay. We're</p>

		<p>07 done with that one. You can pass that one to</p> <p>08 Wes. Let me show you Exhibit 31.</p> <p>09 (Whereupon, Plaintiff's Exhibit 31</p> <p>10 was marked for identification and</p> <p>11 copy of same is attached hereto.)</p> <p>12 Q. And this is listed in the top</p> <p>13 heading. It's Bates number 42. And in that</p> <p>14 grayed out area it says, Harassment in the</p> <p>15 Workplace; do you see that?</p> <p>16 A. I see that.</p> <p>17 Q. Okay. And is this another document</p> <p>18 that would have been included in that hire</p> <p>19 packet?</p> <p>20 A. It is.</p> <p>21 Q. How was this harassment in the</p> <p>22 workplace document distributed?</p> <p>23 A. This particular document in 2017 was</p> <p>091:01 distributed in the hire packet.</p> <p>02 Q. And how would employees be trained on</p> <p>03 this harassment in the workplace?</p> <p>04 A. It was also part of the eight hours</p> <p>05 of training that the employee would go through</p> <p>06 at the beginning before they were assigned to a</p> <p>07 shift.</p> <p>08 Q. Okay. That eight hours, was that</p> <p>09 eight hours just videos, or was there other --</p> <p>10 were there other things that happened in that</p> <p>11 eight hours?</p> <p>12 A. It's video and interaction.</p>
12	094:16 - 094:16	094:16 MR. REDMOND: Object to form.
13	104:12 - 104:17	<p>104:12 Q. Okay. So is it your understanding</p> <p>13 that Gloria Robinson informed Ms. Key that her</p> <p>14 dreadlocks could be worn if they were styled?</p> <p>15 MR. MILLER: Object to the form.</p> <p>16 A. My understanding is that she was told</p> <p>17 that a style was acceptable.</p>
14	116:08 - 116:22	<p>116:08 Q. All right. If you will look for me</p> <p>09 on Exhibit 31, the second paragraph under</p> <p>10 policies so -- where it begins prohibited.</p> <p>11 Okay.</p> <p>12 So the second sentence that, "The</p> <p>13 company will not tolerate harassment of any</p>

		<p>14 kind," and then it goes on to say that,</p> <p>15 "Employees engaging in such conduct will be</p> <p>16 subject to appropriate disciplinary action up</p> <p>17 to and including termination of employment."</p> <p>18 Would Ms. Gloria Robinson's</p> <p>19 statements, related to the medical conditions,</p> <p>20 be included as a violation of this harassment</p> <p>21 policy?</p> <p>22 MR. REDMOND: Object to form.</p>
15	122:07 - 122:13	<p>122:07 Q. This is the dismissal and notice of</p> <p>08 rights; do you see that?</p> <p>09 A. I do see that.</p> <p>10 Q. Okay. And when was this document</p> <p>11 received by Dynamic Security?</p> <p>12 A. This document was received</p> <p>13 March 20th, 2019.</p>
16	127:16 - 127:16	127:16 MR. REDMOND: Object to form.
17	200:02 - 202:08	<p>200:02 Q. If you need Gloria Robinson's memo</p> <p>03 back to answer this, we can get it. You may be</p> <p>04 able to answer otherwise.</p> <p>05 From looking at Ms. Robinson's memo,</p> <p>06 is it correct that Cassandra Williams</p> <p>07 participated in part of the initial interview</p> <p>08 just in terms of expressing her opinion about</p> <p>09 the hair --</p> <p>10 A. Yes.</p> <p>11 Q. -- correct?</p> <p>12 A. That is correct.</p> <p>13 Q. All right. So after Gloria Robinson</p> <p>14 finished her interview, Ms. Williams came in</p> <p>15 and was involved in that discussion about the</p> <p>16 hair; correct?</p> <p>17 MS. BROWN: Object to the form.</p> <p>18 MR. MILLER: Object to the form.</p> <p>19 A. Yes. Ms. Williams came in after the</p> <p>20 interview and --</p> <p>21 Q. Since they object, let me answer</p> <p>22 this. And we know this is not based on your</p> <p>23 first-hand knowledge. But based on what you've</p> <p>201:01 seen, what was Ms. Williams' role in that</p> <p>02 initial interview with Ms. Key that Ms.</p> <p>03 Robinson had?</p>

04 MS. BROWN: Object to the form.

05 MR. MILLER: Object to the form. She

06 said she was not in the initial interview.

07 This is the testimony of the document.

08 A. The document seems to -- the document

09 seems to indicate that the purpose of

10 Ms. Williams coming in was to -- was to discuss

11 the hairstyle that Ms. Key was wearing.

12 Q. And just so we can clarify, at what

13 part during the discussions that day did

14 Ms. Williams participate?

15 MS. BROWN: Object to the form.

16 MR. MILLER: Object to the form.

17 A. It seems to indicate that it was

18 after the initial interview with Ms. Robinson.

19 Q. And are you familiar with the EEOC

20 posters?

21 A. I am.

22 Q. And does Dynamic Security post those

23 posters?

202:01 A. We do.

02 Q. And are they posted at each

03 individual branch?

04 A. They are.

05 Q. And do you know in 2017, would those

06 posters have been posted at the Montgomery

07 branch?

08 A. They would have, yes.